

**THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

MARK WALTERS	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civ. No. 1:23-cv-03122-MLB
	)	
OpenAI, L.L.C.,	)	
	)	
Defendant.	)	
	)	

**NOTICE OF MEMBER CITIZENSHIP**

Defendant OpenAI, L.L.C. (“OpenAI” or “Defendant”), through its undersigned counsel, hereby files this Notice of Member Citizenship in support of its Notice of Removal [ECF 1] of Case No. 23-A-04860-2, filed in the Superior Court of Gwinnett County, State of Georgia (the “State Court Action”):

1. OpenAI is a Limited Liability Company.
2. OpenAI OpCo, L.L.C. is OpenAI, L.L.C.’s sole member.
3. None of OpenAI OpCo, L.L.C.’s members or constituent entities are citizens of Georgia.

Dated: July 21, 2023

Respectfully submitted,

DLA Piper LLP (US)

By: /s/ Brendan Krasinski  
Brendan Krasinski

Georgia Bar No. 159089  
1201 West Peachtree Street, Suite 2900  
Atlanta, Georgia 30309  
Tel.: (404) 736-7861  
Fax: (404) 682-7831  
brendan.krasinski@us.dlapiper.com

Ilana H. Eisenstein, *pro hac vice* pending  
Marie Bussey-Garza, *pro hac vice* pending  
One Liberty Place  
1650 Market Street, Suite 5000  
Philadelphia, PA 19103  
Tel.: (215) 656-3300  
Fax: (215) 656-3301  
ilana.eisenstein@us.dlapiper.com  
marie.bussey-garza@us.dlapiper.com

Peter Karanjia, *pro hac vice* pending  
500 Eighth Street, NW  
Washington, DC 20004  
Tel.: (202) 799-4000  
Fax: (202) 799-5000  
peter.karanjia@us.dlapiper.com

Danny Tobey, *pro hac vice* pending  
1900 N. Pearl St., Suite 2200  
Dallas, TX 75201  
Tel.: (214) 743-4500  
Fax: (214) 743-4545  
danny.tobey@us.dlapiper.com

Ashley Allen Carr, *pro hac vice* pending  
303 Colorado Street, Suite 3000  
Austin, TX 78701  
Tel.: (512) 457-7000  
Fax: (512) 457-7001  
ashley.carr@us.dlapiper.com

*Attorneys for Defendant OpenAI, L.L.C.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on this 21<sup>st</sup> day of July 2023, I electronically filed the foregoing Notice of Member Citizenship with the Clerk of Court using the CM/ECF system, which will send e-mail notification of such filing to all attorneys of record.

Dated: July 21, 2023

By: /s/ *Brendan Krasinski*  
Brendan Krasinski